



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street, 3rd floor
New York, NY 10007*

February 9, 2021

BY ECF

Honorable Barbara C. Moses
United States Magistrate Judge
United States District Court
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: Daniel Boland v. Comm'r of Soc. Sec.
20 Civ. 7312 (ER) (BCM)

Dear Judge Moses:

Pursuant to the schedule in the above-referenced Social Security case, the administrative record is due on February 12, 2021. We write respectfully to request that the time to file the record be extended for 60 days, until April 13, 2021. The reason for this request is the Social Security Administration ("SSA") needs more time to prepare the record. As explained in the attached declaration of Jebby Rasputnis, Executive Director of SSA's Office of Appellate Operations, as a result of the pandemic SSA has had to redesign its business process to produce records remotely, and is also faced with the challenge of a significant increase in the number of new cases filed.

We have attempted to obtain the consent of plaintiff's counsel to this proposed adjournment, but counsel did not consent. Asked for the reason for not consenting to the

extension, counsel stated that it was their “office policy.” One prior adjournment has been granted in this case. We appreciate the Court’s consideration of this request.

Respectfully,

AUDREY STRAUSS
United States Attorney

By: s/ Susan D. Baird
SUSAN D. BAIRD
Assistant United States Attorney
tel. (212) 637-2713
Susan.Baird@usdoj.gov

Enc.

cc: Daniel Osborn, Esq.

Application GRANTED. No further extensions will be granted absent compelling circumstances. SO ORDERED.



Barbara Moses, U.S.M.J.
February 11, 2021